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February 5, 2018

BY ECF

Honorable Robert M. Levy
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Jemal Earle v. City of New York, et al., 16-cv-0171 (SJ)(RML)

Your Honor:

I am an Assistant Corporation Counsel assigned to the defense of this matter on behalf of defendants. I write jointly on behalf of plaintiff and defendants to request an extension of the deadline by which discovery must be completed from today, February 5, 2018 to April 15, 2018. This is the fifth request for an extension of the discovery deadline. The previous four have been granted.

This request is being made because the parties have been unable to schedule the remaining two depositions in this matter, that of Officer Marc Rudon and Sergeant Steven Crozier. Counsel for plaintiff has informed me that she is scheduled to be on trial, for which the pretrial conference is February 12, 2018 and the trial begins on February 20, 2018. Plaintiff's counsel is scheduled to begin a second trial March 5, 2018. The requested extension has thus taken these scheduling matters into account.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/

Angharad Wilson
Assistant Corporation Counsel

cc: Baree Fett, Esq. (via ECF)
Jeffrey I. Weiner, Esq. (via ECF)
Attorney for Plaintiff